## IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA

UNITED STATES OF AMERICA,

Case No. 8:19-cr-00181

VS.

MOTION TO FILE UNDER SEAL

DETRIC MCGOWAN, a/k/a "Fat"

**DEFENDANT** 

The Defendant, by and through the undersigned counsel, hereby moves this Court to seal the Defendant's motion for variance and sentencing memorandum. The purpose of the Defendant's request is to protect sensitive information contained in the motion for variance.

The Defendant respectfully submits that the need to protect the sensitive nature of the information included in the motion trumps the public's limited interest in access to materials related to this prosecution. The Defendant notes that the Court has the inherent authority to seal documents of this type. See *Baltimore Sun v. Goetz*, 886 F.2d 60 (4<sup>th</sup> Cir. 1998); and *in re Application of the United States for an Order Pursuant to 18 U.S.C. § 2703(D)*, 707 F. 3d 283 (4<sup>th</sup> Cir. 2013).

The Defendant therefore requests that the Court direct that the Defendant's motion be sealed. Defense counsel will provide copies of the sealed filing to the Government.

Respectfully Submitted,

/s/ Ryan L. Beasley Ryan L. Beasley, #9162 Ryan L. Beasley, P.A. 416 East North Street Greenville, SC 29601 T: (864)679-7777 F: (864)672-1406

rlb@ryanbeasleylaw.com

March 11, 2020 Greenville, SC